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**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re: Case No. 19-30088 (DM) (Lead Case)

PG&E CORPORATION

Chapter 11

- and -

Chapter 11

PACIFIC GAS AND ELECTRIC
COMPANY.

(Jointly Administered)

Debtors.

- Affects Both Debtors
- Affects PG&E Corporation
- Affects Pacific Gas and Electric Company

**JOINDER OF THE LABORERS' AND
RETIREMENT BOARD EMPLOYEES'
ANNUITY AND BENEFIT FUND OF
CHICAGO TO SECURITIES LEAD
PLAINTIFF'S OBJECTION TO
REORGANIZED DEBTORS' MOTION TO
APPROVE SECURITIES ADR AND
RELATED PROCEDURES FOR
RESOLVING SUBORDINATED
SECURITIES CLAIMS [D.L. 9189]**

The Laborers' and Retirement Board Employees' Annuity and Benefit Fund of Chicago, the holder of a Securities Claim¹ and a creditor in the chapter 11 bankruptcy cases (the “**Chapter 11 Cases**”) of the above-captioned reorganized debtors (the “**Debtors**”, or as reorganized pursuant to the Plan, the “**Reorganized Debtors**”), by and through its undersigned counsel, submits this joinder (“**Joinder**”) to *Securities Lead Plaintiff's Objection to Reorganized Debtors' Motion to Approve Securities ADR and Related Procedures for Resolving Subordinated Securities Claims* [Docket No. 9189] (the “**Securities ADR Objection**”), in opposition to *Reorganized Debtors' Motion to Approve Securities ADR and Related Procedures for Resolving Subordinated Securities Claims* [Docket No. 8964] (the “**Securities ADR Motion**”). In support of this Joinder, the Laborers' and Retirement Board Employees' Annuity and Benefit Fund of Chicago, respectfully states as follows:

JOINDER AND RESERVATION OF RIGHTS

1. The Laborers' and Retirement Board Employees' Annuity and Benefit Fund of Chicago is a Securities Claimant and timely filed proofs of claim against the Debtors by the Extended Bar Date (Claim Nos. JGJVP27423 and HISVA27423).

2. The Laborers' and Retirement Board Employees' Annuity and Benefit Fund of Chicago incorporates by reference and hereby joins in all arguments set forth in the Securities ADR Objection.

3. The Laborers' and Retirement Board Employees' Annuity and Benefit Fund of Chicago reserves its right to supplement this Joinder and further reserves its rights to participate in any hearing to consider the Securities ADR Motion, including its rights to make any arguments and to examine witnesses.

¹ Capitalized terms not defined herein shall have the meaning ascribed to them in the Securities ADR Objection (as defined herein) and the Securities ADR Motion (as defined herein), as applicable.

CONCLUSION

For all of the foregoing reasons, the Laborers' and Retirement Board Employees' Annuity and Benefit Fund of Chicago respectfully requests that this Court enter an Order denying the Securities ADR Motion and granting such other and further relief as may be just and proper.

Dated: October 6, 2020

BARRACK, RODOS & BACINE

By: /s/ Samuel M. Ward

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